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10 *Attorneys for Fire Victim Trustee*

11
12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 **In re:**

16 **PG&E CORPORATION**

17 **-and-**

18 **PACIFIC GAS AND ELECTRIC**
19 **COMPANY,**

20 **Debtors.**

- 21 ☐ Affects PG&E Corporation
22 ☐ Affects Pacific Gas and Electric Company
23 ☒ Affects both Debtors

24 **All papers shall be filed in the Lead Case,*
25 *No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**STATUS CONFERENCE STATEMENT
REGARDING MOTION OF THE FIRE
VICTIM TRUSTEE PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2004 FOR ENTRY OF AN
ORDER AUTHORIZING SERVICE OF
SUBPOENAS ON THE SUBROGATION
WILDFIRE TRUST, SUBROGATION
WILDFIRE CLAIMANTS, AND
INSURERS WITH CLAIM FILES**

1 The Honorable John K. Trotter (Ret.), in his capacity as the Fire Victim Trustee
2 (the “**Trustee**”), by and through his undersigned counsel, hereby submits this *Status Conference*
3 *Statement* regarding the Rule 2004 Motion [Dkt. No. 9483] filed on November 9, 2020.¹

4 **First Supplement.** On November 13, 2020, the Trustee filed the First Supplement [Dkt.
5 No. 9514] to the Rule 2004 Motion and identified parties on Exhibit 1 thereto, including related
6 parties and affiliates, that have Claim Files and claims-related documents for insured fire victims.
7 The First Supplement was filed in response to the Order entered by this Court on November 10,
8 2020, requesting that the Trustee identify the respondents of the Subpoenas. *See* Dkt. No. 9489.

9 **Second Supplement.** On November 20, 2020, the Trustee filed the Second Supplement
10 [Dkt. No. 9585] to the Rule 2004 Motion and withdrew without prejudice the Rule 2004 Motion to
11 the extent that it sought authority to serve Subpoenas on the “Cooperating Carriers” identified on
12 Exhibit A to the Second Supplement. The Rule 2004 Motion, as amended by the First Supplement
13 and the Second Supplement, sought authority to serve Subpoenas on (i) the “Non-Cooperating
14 Carriers” identified on Exhibit B to the Second Supplement and (ii) the Wildfire Subrogation Trust.

15 **Rule 2004 Order.** On November 23, 2020, the Court entered an Order authorizing the
16 Trustee to serve Subpoenas on the “Non-Cooperating Carriers” identified on Exhibit B to the
17 Second Supplement. *See* Dkt. No. 9594 (the “**Rule 2004 Order**”). Pursuant to the Rule 2004
18 Order, on December 4, 2020, the Trustee served Subpoenas on certain of the Non-Cooperating
19 Carriers. *See* Dkt. No. 9722. By the Rule 2004 Order, the Court also set a status conference for
20 December 15, 2020, to address any unresolved Rule 2004 issues between the Fire Victim Trust and
21 the Subrogation Wildfire Trust and directed counsel for the Fire Victim Trust to file a Status
22 Conference Statement with the Court no later than December 11, 2020. *Id.*

23 **Stipulation.** On December 1, 2020, the Fire Victim Trust and the Subrogation Wildfire
24 Trust entered into a *Stipulated Confidentiality Agreement and Protective Order on the Production*
25 *of Certain Claims Information* [Dkt. No. 9676] (the “**Stipulation**”), which Stipulation was filed
26 with the Court on December 2, 2020. Also, on December 2, 2020, the Fire Victim Trust, with the

27
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings given to them in the Rule 2004 Motion.

1 consent of the Wildfire Subrogation Trust, filed a Notice of Withdrawal Without Prejudice of the
2 Rule 2004 Motion [Dkt. No. 9686] (the “**Withdrawal Notice**”) to the extent that it sought authority
3 to serve a Subpoena on the Wildfire Subrogation Trust. The Court entered an Order approving the
4 Stipulation on December 7, 2020. *See* Dkt. No. 9753.

5 **Status Conference.** As a result of the Stipulation and the Withdrawal Notice, all issues
6 remaining between the Fire Victim Trust and the Subrogation Wildfire Trust have been resolved.
7 The Trustee does not believe that the status conference on the Rule 2004 Motion currently
8 scheduled for December 15, 2020, is necessary. Further, as result of the Rule 2004 Order, the
9 Stipulation and the Withdrawal Notice, the issues raised by the Rule 2004 Motion, as amended by
10 the First Supplement and the Second Supplement, have been addressed.

11 The Trustee sincerely appreciates the Court’s attention to these matters.

12 DATED: November 9, 2020

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